

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

CHRISTINE CONFORTI, ARATI KREIBICH, )  
MICO LUCIDE, JOSEPH MARCHICA, )  
KEVIN MCMILLAN, ZINOVIA SPEZAKIS, )  
and NEW JERSEY WORKING FAMILIES )  
ALLIANCE, INC., )

Plaintiffs, )

vs. )

CHRISTINE GIORDANO HANLON, in her )  
official capacity as Monmouth County Clerk, )  
SCOTT M. COLABELLA, in his official )  
Capacity as Ocean County Clerk; and PAULA )  
SOLLAMI COVELLO, in her official capacity )  
as Mercer County Clerk, JOHN S. HOGAN, in )  
his official capacity as Bergen County Clerk, )  
EDWARD P. MCGETTIGAN, in his official )  
capacity as Atlantic County Clerk, and E. )  
JUNIOR MALDONADO, in his official )  
capacity as Hudson County Clerk, )

Defendants. )

Civil Action No. 3:20-cv-08267-FLW-TJB

**NOTICE OF MOTION TO  
DISMISS PLAINTIFFS' FIRST AMENDED  
COMPLAINT AS TO DEFENDANT,  
CHRISTINE GIORDANO HANLON, in her  
official capacity as Monmouth County Clerk,  
PURSUANT TO F.R.C.P. 12(b)(6)**

**TO COUNSEL:**

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in his official capacity as Ocean County Clerk*

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*in her official capacity as Mercer County Clerk*  
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**NOTICE IS HEREBY GIVEN** that on May 28, 2021, at 9 a.m., or as soon thereafter as the matter can be heard before the United States District Court for the District of New Jersey, Trenton Vicinage, Defendant Christine Giordano Hanlon, in her official capacity as Monmouth County Clerk (hereinafter “Hanlon”) will move before the Court to enter an Order dismissing plaintiffs’ First Amended Complaint as to Hanlon, pursuant to both Federal Rule of Civil Procedure 12(b)(6) and Local Rule 12.1.

The motion is made on the grounds that the First Amended Complaint of plaintiffs, Christine Conforti, Arati Kreibich, Mico Lucide, Joseph Marchica, Kevin McMillan, Zinovia Spezakis, and New Jersey Working Families Alliance, Inc. (collectively “plaintiffs”) cannot state a cause of action as to Hanlon, and that Hanlon is entitled to dismissal of all claims in plaintiffs’ First Amended Complaint, with prejudice. This motion will be based on this Notice of Motion and Motion, the Memorandum in Support thereof, Declaration of Erik Anderson, Esq., as served and filed herewith, the records and file herein, and on such evidence as may be presented at the hearing of the motion.

DATED: March 29, 2021

/S/ Erik Anderson, Esq.

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ERIK ANDERSON, ESQ.  
Thomas W. Carter, Esq.

Reardon Anderson, LLC  
*Attorneys for Defendant,*  
*Christine Giordano Hanlon, in*  
*her capacity as Monmouth County*

*Clerk*